

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

2006 SEP -8 AM 10:53

In re
CONTINENTAL AIRLINES, INC.,

) Chapter 11

U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

) Case No. 90-932

Brownie N Inman
Identified member of the class
of LPP CLAIMANTS,

) Adversary No. 99-412 (MFW)

) re: Docket No. 454

v.

) Appeal No. 90-00932

JAMES BALDRIDGE, WILLIAM MANN
and LARRY DUNN.
Representatives of the LPP CLAIMANTS,

and

CONTINENTAL AIRLINES, INC.
Debtor

DESIGNATION OF DOCUMENTS

I, Brownie N Inman, in accordance with Bankruptcy Rule 8006 petition this Court, the debtor and the class representatives the following records to be produced and forwarded for this appeal.

1. Request Continental produce the Ms. Edna Smith affidavit, docket # 72, in the adversary proceeding 99-412, page 2, para 3 (a) testifies of 5000 proofs of LPP claims. Please forward those 5000 names, alphabetically or in seniority order. Furthermore, in the same affidavit Edna Smith testifies that

she makes a list to be used to reconcile with Class Counsel's submissions.

Please produce the list she used.

2. Adversary Proceeding A-99-412, Page 4, requires eligible pilots to be "members of Eastern's flight deck collective bargaining unit". Request Continental provide the names of those pilots who were members of the flight deck collective bargaining unit who were active at the date of shutdown.
3. Adversary Proceeding No A-99-412, Page 5, para 6, Class Counsel discovered 248 persons not previously identified. Class Representatives should produce any documentation to substantiate this claim. Additionally, the B list (those 248) should be produced by Class Representatives, as well as documentation as to those who were actually contacted and who actually received the settlement, by name, if any.
4. Adversary Proceeding No 99-412, page 4, para 3. Class Representatives should provide the Motion to Clarify and all supporting documentation which led to "newhire" pilots being eliminated from the Class Settlement. "Proofs of Claim filed by ALPA for enforcement of LPPs against CAL excluded the "newhire" pilots etc etc" Continental should provide an example of those "Proofs of Claim".
5. The Class was certified on Feb 3, 2000. Seventeen months later the

Court Granted the Class Settlement by requiring LPP Claimants be on the Nov 1990 Alphabetical Seniority List. Adversary Proceeding A-99-412, page 4, para 4 keeps referring to a Seniority List that has never existed, ie., the Nov 1990 Alphabetical List. Request Continental legal, Class Counsel, and Class Representatives provide any documentation why they have continued to pretend there is such a list when one has never existed, and why, as officers of the court, they induced a trusting Bankruptcy Judge, relying on their integrity to sign a ridiculous settlement order (using that fantasy list) that had no basis in objective reality.

6. Adversary Proceeding A-99-412 page 6, first sentence, “the entire Nov 1990 Seniority List consisting of 3,387 persons”. Class Representatives should provide that list.

7. Numerous “newhires” such as Brownie Inman, Peter Neumann, and Terry Philips received a settlement offering while simultaneously the entire subset of “newhires” was deleted as per Adversary Proceeding No A-99-412. Class Counsel and Class Representatives should provide documentation why this was possible.

8 In October 1998 Class Counsel and Class Representatives negotiated an agreement with Continental which allowed them to litigate on behalf of all LPP Claimants etc etc. Class Representatives should provide any

documentation to this agreement and if a Class Action was also agreed to at that time.

9 Class Representatives should provide any documentation that they communicated to the Court that they had access to approximately two million dollars provided by the members of Eastern Pilots for Fairness, which was used to pay their expenses and the legal costs of the Class Counsel.

Sept 2, 2006

A handwritten signature in cursive script, appearing to read "Brownie N Inman".

Brownie N Inman, *Pro Se*
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